UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:		CHAPTER 7
TAE WAN KIM and VICTORIA S. KIM,		CASE NO. 18-11129 (elf)
	Debtors	

ENTRY OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS, AND RESERVATION OF RIGHTS

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Sysco Philadelphia, LLC ("Sysco"), a creditor and party in interest, and under, *inter alia*, Bankruptcy Rules 2002, 9007, and 9010 of the Bankruptcy Code, requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon:

Sergio I. Scuteri, Esquire CAPEHART & SCATCHARD, P.A. 8000 Midlantic Drive, Suite 300 S Mt. Laurel, NJ 08054 Tel. (856) 234-6800 Fax (856) 235-2786 sscuteri@capehart.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, courier service, hand-delivery, telephone, facsimile transmission,

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telegraph, telex, or otherwise (1) that affects or seeks to affect any way any rights or interests of

any creditor or party in interest in this case, including Sysco with respect to: (a) the debtor: (b)

property of the estate, or proceeds thereof, in which the debtor may claim an interest; or (c)

property or proceeds thereof in the possession, custody, or control of others that the debtor may

seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or

other conduct by Sysco.

PLEASE TAKE FURTHER NOTICE that Sysco intends that neither this Entry of

Appearance nor any later appearance, pleading, paper, claim, or suit shall waive (1) the right of

Sysco to have final orders in non-core matters entered only after de novo review by a District

Judge; (2) the right of Sysco to trial by jury in any proceeding so triable in this case or any case,

controversy, or proceeding related to this case, (3) the right of Sysco to have the District Court

withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4)

any other rights, claims, actions, defenses, set-offs, or recoupments to which Sysco is or may be

entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions,

defenses, set-offs, and recoupments are expressly reserved.

CAPEHART & SCATCHARD, P.A.

A Professional Corporation

Dated: March 23, 2018

By: /s/ Sergio I. Scuteri

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